

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>KRISJENN RANCH, LLC, et al</b>	§	<b>Case No. 20-50805</b>
	§	
<b>Debtor</b>	§	<b>(Jointly Administered)</b>

**FINAL APPLICATION FOR PAYMENT OF ATTORNEY FEES BY  
CJ MULLER & ASSOCIATES, PLLC, ATTORNEYS FOR  
KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE RANCH,  
AND KRISJENN RANCH, LLC, SERIES PIPELINE ROW, DEBTORS-IN-  
POSSESSION, FOR PROFESSIONAL SERVICES RENDERED FROM  
DECEMBER 8, 2021 THROUGH MARCH 31, 2022**

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**THIS APPLICATION REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. RESPONSES OR OBJECTIONS MUST BE IN WRITING AND FILED WITH THE COURT IN ORDER TO SEEK A HEARING ON THIS APPLICATION.**

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1. CJ Muller & Associates, PLLC has applied for professional compensation in the amount of \$44,125.00 in fees and \$1,986.60 in administrative expenses for a total amount requested of \$46,111.60.

2. The time period covered is December 8, through March 31, 2022.

3. The movant is the attorney for KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”), the Debtors and Debtors-in-Possession.

4. This is the final application.

5. The movant has previously received fees and expenses post-petition.
6. The movant did not receive an original retainer.
7. The hourly rates charged for attorneys are \$325.00/hour to \$350.00/hour for partners and senior attorneys, \$250/hour for junior attorneys, and \$120/hour for paralegals and law clerks.

Dated: April 1, 2022

Respectfully Submitted,

CJ MULLER & ASSOCIATES, PLLC

By: /s/ John Muller  
C. John Muller IV  
State Bar No. 24070306  
[john.muller@cjma.law](mailto:john.muller@cjma.law)  
Ezekiel J. Perez  
State Bar No. 24096782  
[zeke.perez@cjma.law](mailto:zeke.perez@cjma.law)  
111 W. Sunset Rd.  
San Antonio, TX 78209  
Telephone: 210-664-5000  
Facsimile: 210-899-1933

ATTORNEYS FOR DEBTORS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Application for Payment of Attorney's Fees by CJ Muller & Associates, PLLC, Attorneys for Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row was forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on April 1, 2022.

/s/ John Muller  
JOHN MULLER

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**In re:**  
**KRISJENN RANCH, LLC, et al**  
*Debtors*

§  
§  
§  
§

**Chapter 11**  
  
**Case No. 20-50805**  
**(Jointly Administered)**

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**FINAL APPLICATION FOR PAYMENT OF ATTORNEY FEES BY CJ  
MULLER & ASSOCIATES, PLLC, ATTORNEYS FOR KRISJENN RANCH,  
LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH,  
AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW  
(COLLECTIVELY THE “DEBTORS”) RENDERED FROM  
DECEMBER 8, 2021 THROUGH MARCH 31, 2022**

\*\*\*\*\*

**THIS APPLICATION REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. RESPONSES OR OBJECTIONS MUST BE IN WRITING AND FILED WITH THE COURT IN ORDER TO SEEK A HEARING ON THIS APPLICATION.**

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW CJ Muller & Associates, PLLC f/k/a Muller Smeberg, PLLC (“Applicant”), attorneys for KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors”), pursuant to 11 U.S.C. §§ 503(b)(2), 507(a), and 331, as a priority administrative expense, and files its final fee application, and would respectfully show as follows:

**I.  
INTRODUCTION**

1. Applicant seeks payment from the bankruptcy estate—as an administrative expense—professional fees and expenses in the amount of \$46,111.60 for the time period

December 8, 2021 through March 31, 2022. (“Compensation Period”).

**II.**  
**BANKRUPTCY RULE 2016 REQUIREMENTS**

2. Applicant was appointed on April 27, 2020.
3. All professional services for which an allowance is requested were performed by Applicant for and on behalf of Debtors and not on behalf of any other person. This application seeks approval of fees of Applicant.

**III.**  
**FEES AND PAYMENT HISTORY**

4. The Applicant is the attorney for KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row.
5. Applicant has previously applied for professional compensation in the amount of \$168,270.45 in fees and expenses.
6. The time period covered is December 8, 2021, through March 31, 2022.
7. This is the final fee application for the period covered.
8. The hourly rates charged for attorneys are \$325 to \$350.00/hour for partners and senior attorneys, \$250/hour for associate attorneys, and \$120/hour for paralegals and law clerks.
9. The Applicant has received payments from Larry Wright in the amount of \$392,396.10, as follows:
  - a. \$5227.60 on September 1, 2020
  - b. \$23,707.20 on October 1, 2020
  - c. \$28,609.41 on October 30, 2020
  - d. \$35,269.84 on November 30, 2020
  - e. \$27,361.20 on January 18, 2021
  - f. \$13,638.80 on January 18, 2021
  - g. \$44,200.00 on May 7, 2021
  - h. \$214,382.05 on February 22, 2022
10. Applicant has agreed to discount its fees in the amount of \$25,000.00

11. After applying the payments received and the discount, the balance owed on this fee application to be paid from Debtor's funds is \$46,111.60.

**IV.**  
**JOHNSON FACTORS ANALYSIS**

12. Applicant requests compensation based on the factors set forth in 11 U.S.C. § 330(a)(3) and *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974). These factors include the following:

- a. Time and Labor Required. A description of the time and labor sorted by category of activity of Applicant appears in Exhibit A.
- b. The Skill Required to Perform the Legal Services Provided. Applicant represented Debtors in Adversary No. 20-05027 (the "Adversary"), which included the successful prosecution of a request for declaratory relief concerning a multi-million-dollar pipeline and right-of-way and successful defense of over thirty counterclaims alleging causes of action ranging from breach of contract to fraud. The issues presented were highly complex and required a high level of skill. Applicant has the necessary skills to successfully provide the services needed in this case.
- c. The Preclusion of Other Employment by the Attorney Due to Acceptance of the Case. Applicant allocated a large amount of time and staffing to adequately prepare for and participate in the trial in this case; consequently, Applicant was required to refrain from rendering services in other matters.
- d. The Customary Fee. The compensation sought herein is comparable to the fees charged by other attorneys of comparable experience in the San Antonio, Texas market.

- e. Whether the Fee is Fixed or Contingent. The fee is fixed at \$325.00 to \$350.00 per hour for partners and senior attorneys, \$250.00 per hour for junior attorneys, and \$120.00 per hour for paralegals. This case was not taken on a contingent basis.
- f. Time Limitations by the Client or Other Circumstances. Applicant began representing Debtors at the inception of the Adversary Proceeding and had to, among other things: (1) propound and respond to a large volume of written discovery; (2) defend and take numerous depositions; (3) file and defend dispositive motions, including motions for summary judgment; (4) file numerous discovery motions; (4) prepare for trial; and (5) attend trial, all in less than eight months.
- g. The Experience, Reputation and Ability of the Attorneys. Applicant's primary attorney working on this case is C. John Muller IV. Mr. Muller has developed a reputation as a premier commercial litigator in the San Antonio, Texas market. Debtors selected John Muller based on his experience and knowledge in the field of civil litigation.
- h. The "Undesirability" of the Case. This case is not undesirable.
- i. Nature and Length of the Professional Relationship with the Client. Applicant was retained by Debtor for representation on April 27, 2020.
- j. Results Obtained. Applicant successfully prosecuted a request for declaratory relief concerning a multi-million-dollar pipeline and right-of-way and successfully defended against more than thirty counterclaims alleging causes of action ranging from breach of contract to fraud and seeking tens of millions of

dollars in damages.

- k. Awards in Similar Case. The amount requested is similar or less than what other attorneys of similar experience would charge in similar cases.
- l. Travel Time. Applicant did not bill for travel time.
- m. Other Factors. There are no other factors of particular importance to the fee request.

WHEREFORE PREMISES CONSIDERED, pursuant to 11 U.S.C. §§ 503(b)(2), 507(a), and 331, the Applicant respectfully requests the approval of the Fee Application of CJ Muller & Associates for payment of professional fees in the amount of \$46,111.60 under 11 U.S.C. § 503 and for all other relief to which it may be justly entitled.

Dated: April 1, 2022.

Respectfully Submitted,

CJ MULLER & ASSOCIATES, PLLC

By: /s/ John Muller  
C. John Muller IV  
State Bar No. 24070306  
[john.muller@cjma.law](mailto:john.muller@cjma.law)  
Ezekiel J. Perez  
State Bar No. 24096782  
[zeke.perez@cjma.law](mailto:zeke.perez@cjma.law)  
111 W. Sunset Rd.  
San Antonio, TX 78209  
Telephone: 210-664-5000  
Facsimile: 210-899-1933

ATTORNEYS FOR DEBTORS



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Application for Payment of Attorney's Fees by CJ Muller & Associates, PLLC, Attorneys for Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row was forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on April 1, 2022.

/s/ John Muller  
JOHN MULLER

**EXHIBIT A**  
**Adversary No. 20-05027**

**DRAFTING AND MISCELLANEOUS LEGAL SERVICES  
FOR PROFESSIONAL SERVICES RENDERED**

<b>Bill ID</b>	<b>Date</b>	<b>User</b>	<b>Hours</b>	<b>Description</b>	<b>Qty.</b>	<b>Rate (\$)</b>	<b>Total</b>
1598	1/10/2022	Charles Muller	7.8	Draft and edit Appellees' Response brief.	7.8	350	\$ 2,730.00
1598	1/5/2022	Charles Muller	2	Inspect station; Confer with security personnel; Confer with client re various traffic issues; Schedule status conference to discuss next steps.	2	350	\$ 700.00
1557	12/10/2021	Charles Muller	6.1	MEDIATION	6.1	350	\$ 2,135.00
1557	12/8/2021	Charles Muller	5.5	Attend McLeod Deposition	3	350	\$ 1,925.00
1598	2/8/2022	Ezekiel Perez	0.3	Consolidate draft agreement and signature pages; confer with J. Muller regarding the same.	0.3	250	\$ 75.00
1598	1/13/2022	Ezekiel Perez	5.2	Continue draft appeal brief; edit documents to be consolidated; confer with J. Muller regarding the same. Research recordation numbers for lien releases (settlement documents).	5.2	250	\$ 1,300.00
1557	12/27/2021	Ezekiel Perez	6.6	Continue draft of response to motion for protection; motion for continuance; and motion to compel.	6.6	250	\$ 1,650.00
1557	12/22/2021	Ezekiel Perez	2.6	Continue draft response to objection.	2.6	250	\$ 650.00
1557	12/28/2021	Ezekiel Perez	6.9	Continue research and draft response to motion for protection; motion to compel; and motion for continuance.	6.9	250	\$ 1,725.00
1598	1/10/2022	Ezekiel Perez	8.1	Draft appellee brief.	8.1	250	\$ 2,025.00

1598	1/11/2022	Ezekiel Perez	6.8	Draft response brief argument and background; begin draft of settlement agreement on Claim 6.	6.8	250	\$ 1,700.00
1557	12/20/2021	Ezekiel Perez	3.7	Draft response to Motion for protection.	3.7	250	\$ 925.00
1557	12/14/2021	Ezekiel Perez	0.8	Edit Dismissal Agreement; calls to A. Krist. and C. Johns; correspondence with opposing counsel regarding the same; finalize agreement and file.	0.8	250	\$ 200.00
1598	2/2/2022	Ezekiel Perez	1.1	Edit draft settlement agreement and confer with J. Muller regarding the same.	1.1	250	\$ 275.00
1557	12/13/2021	Ezekiel Perez	0.6	Edit draft subpoenas and finalize the same.	0.6	250	\$ 150.00
1557	12/8/2021	Ezekiel Perez	5.5	Edit draft subpoenas; edit fee application; edit conference letter to L. Worsham; draft mediation statement.	5.5	250	\$ 1,375.00
1557	12/21/2021	Ezekiel Perez	1.3	Edit draft subpoenas; edit response to motion for protection.	1.3	250	\$ 325.00
1598	1/14/2022	Ezekiel Perez	7.6	Edit updated draft appeal brief; confer with W. Germany; finalize brief and file.	7.6	250	\$ 1,900.00
1557	12/30/2021	Ezekiel Perez	5.6	Finalize draft response and motion to compel.	5.6	250	\$ 1,400.00
1557	12/15/2021	Ezekiel Perez	0.6	Finalize examination subpoenas; confer with client regarding McLeod claim issue; review responsive documents received from Longbranch.	0.6	250	\$ 150.00
1557	12/10/2021	Ezekiel Perez	4.9	Finalize fee app; edit subpoenas; confer with J. Muller regarding mediation; client call; call with R. Smeberg.	4.9	250	\$ 1,225.00
1557	12/08/2021	Ezekiel Perez	4.6	Prepare for, attend, and assist with deposition of A.	4.6	250	\$ 1,150.00

				McLeod; confer with client regarding the same; correspondence from A. Krist.			
1598	1/12/2022	Ezekiel Perez	6.9	Met with W. Germany regarding joint response brief; continued drafting brief; edits to settlement agreement.	6.9	250	\$ 1,725.00
1598	2/9/2022	Ezekiel Perez	0.8	Multiple correspondence regarding settlement and hearing; review draft motion.	0.8	250	\$ 200.00
1557	12/9/2021	Ezekiel Perez	3.6	Preparations for mediation; edit draft subpoenas; draft litigation hold letter; teleconference with M. Black.	3.6	250	\$ 900.00
1598	1/5/2022	Ezekiel Perez	3.9	Prepare for and attend hearing on motion for protective order; confer regarding updated deadlines; review appeal and begin outlining response argument.	3.9	250	\$ 975.00
1557	12/16/2021	Ezekiel Perez	3.4	Review appeal; confer regarding Kuhlmann subpoena with opposing counsel; draft correspondence regarding the same.	3.4	250	\$ 850.00
1598	1/18/2022	Ezekiel Perez	0.2	Review filing and order.	0.2	250	\$ 50.00
1557	12/8/2021	Sherry Barnash	0.7	Review revised fee application and summary; review and edit letter of correspondence to L. Worsham regarding McLeod production issues; review mediation statement.	0.7	250	\$175.00
1557	12/9/2021	Sherry Barnash	0.7	Review Rule 2004 Subpoena topics for McLeod Oil, LLC deposition; review	0.7	250	\$175.00

				revised fee application, summary, and proposed order.			
							\$ 34,590.00

### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	23.0	\$325/Hour	\$ 7,490.00
Ezekiel Perez	91.6	\$250/Hour	\$ 22,900.00
Sherry Barnash	1.4	\$250/Hour	\$ 350.00

### BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL:	\$ 30740
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CONFERENCES AND HEARINGS  
FOR PROFESSIONAL SERVICES RENDERED

Bill ID	Date	User	Hours	Description	Qty.	Rate (\$)	Total
1598	1/13/2022	Bryan Lopez	1.8	Attention to review of settlement agreement; draft, revise and finalize releases of lien for four counties with the ROW.	1.8	325	\$ 585.00
1557	12/30/2021	Charles Muller	9	194 KrisJenn.McLeod - Doc Review; Edit response to MTQ; Prepare for hearing	9	350	\$ 3,150.00
	2/10/2022	Charles Muller	0.5	Attend Hearing.	0.5	350	\$ 175.00
1598	1/5/2022	Charles Muller	2	Attend Motion to Quash; Motion for Continuance; Post hearing conference with R. Smeberg and L. Worsham.	2	350	\$ 700.00
1598	1/10/2022	Charles Muller	0.5	Client Conference re settlement negotiations;	0.5	350	\$ 175.00
1598	1/26/2022	Charles Muller	0.5	Confer with C. Cavallo re development of ROW; Follow-up with L. Worsham regarding settlement agreement.	0.5	350	\$ 175.00
1598	1/31/2022	Ezekiel Perez	1.5	Attend hearing on disclosures statement; client teleconference; review filings; review reply brief.	1.5	250	\$ 375.00
1557	12/17/2021	Ezekiel Perez	1.9	Call with A. Krist; Correspondence with opposing counsel; review response from Kuhlmann to subpoena; review filing.	1.9	250	\$ 475.00
1598	1/20/2022	Ezekiel Perez	0.2	Client communications.	0.2	250	\$ 50.00

1598	1/4/2022	Ezekiel Perez	4.1	Client meeting; negotiations regarding Claim 6; preparations for hearing and deposition; correspondence from L. Frank; teleconference with R. Smeberg regarding the same; review filing.	4.1	250	\$ 1,025.00
1598	1/6/2022	Ezekiel Perez	0.9	Confer regarding announcement for hearing on claim; correspondence with opposing counsel; review multiple filings.  Confer regarding draft response to appeal.	0.9	250	\$ 225.00
1557	12/23/2021	Ezekiel Perez	0.5	Confer regarding case plan and continue drafting response to motion for protection and motion to compel.	0.5	250	\$ 125.00
1598	1/3/2022	Ezekiel Perez	1.4	Correspondence with A. Krist; review draft 2004 notice; draft correspondence to K. Frank; review draft witness and exhibit list for hearing on objection to claim 6.	1.4	250	\$ 350.00
1598	1/1/2022	Ezekiel Perez	0.2	Confer with W. Germany regarding status of appeal.	0.2	250	\$ 50.00
1598	1/12/2022	Sherry Barnash	0.2	Confer with E. Perez regarding standards of review and focus of argument.	0.2	250	\$50.00
					10.7		\$ 3,310.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	12.5	\$325/Hour	\$ 4,375.00
Bryan Lopez	1.8	\$325/Hour	\$ 585.00
Ezekiel Perez	10.7	\$250/Hour	\$ 2,675.00
Sherry Barnash	0.2	\$250/Hour	\$ 50.00

**BILLING SUMMARY**

TOTAL CHARGES FOR THIS BILL: \$ 7685.00

**PARALEGAL AND CLERICAL  
FOR PROFESSIONAL SERVICES RENDERED**

1598	1/5/2022	Frankie Payne	0.7	Correspondence with Court reporter re: upcoming deposition of W. Kuhlmann, and hearing on Motion to Quash.	0.7	120	\$ 84.00
	3/1/2022	Frankie Payne	0.8	Create assumed name with SOS and send documents to Client for review.	0.8	120	\$ 96.00
1557	12/8/2021	Frankie Payne	0.8	Draft Letter to L. Worsham for Attorney review.	0.8	120	\$ 96.00
1598	1/11/2022	Frankie Payne	1.6	Draft Settlement Agreement for Attorney's review.	1.6	120	\$ 192.00
1598	1/11/2022	Frankie Payne	0.8	Draft table of authorities for appeal brief.	0.8	120	\$ 96.00
1598	1/4/2022	Frankie Payne	0.3	Email L. Frank regarding 2004 exam.	0.3	120	\$ 36.00
1598	1/3/2022	Frankie Payne	0.3	Email L. Frank regarding letter.	0.3	120	\$ 36.00
1598	1/4/2022	Frankie Payne	0.3	Email L. Worsham regarding 2004 exam.	0.3	120	\$ 36.00
	3/30/2022	Frankie Payne	0.3	Email re: Background Check requirements.	0.3	120	\$ 36.00
1598	1/4/2022	Frankie Payne	0.3	Email W Kuhlmann regarding 2004 exam.	0.3	120	\$ 36.00
1557	12/10/2021	Frankie Payne	4.9	Finalize and efile Fee Application and Summary of Fee Application.	4.9	120	\$ 588.00
1557	12/30/2021	Frankie Payne	2.5	Meeting with attorneys to review, revise and compile exhibits for Response to Motion to Quash and Motion for Protective Order and Debtors' Motion to Compel and Motion to Continue. E-file all documents.	2.5	120	\$ 300.00
1557	12/30/2021	Frankie Payne	2.5	Prepare witness and exhibit list for hearing scheduled Jan 12, 2022.	2.5	120	\$ 300.00



1598	1/10/2022	Frankie Payne	2.2	Review court rules and create shell for Appellees' brief.	2.2	120	\$ 264.00
1598	1/13/2022	Frankie Payne	1.1	Review rules and E-file Appellee's response brief.	1.1	120	\$ 132.00
1598	1/14/2022	Frankie Payne	4.7	Revisions of Appellees Response brief; Ensure table of authorities is accurate and finalize word count in preparation of filing.	4.7	120	\$ 564.00
1598	1/9/2022	Frankie Payne	0.5	Work with Court reporter for transcription of D. Borders deposition.	0.5	120	\$ 60.00
1557	12/21/2021	Tonda Sutton	1	Begin analyzing timeline of CSAs.	1	120	\$ 120.00
1598	2/9/2022	Tonda Sutton	0.3	Confer with F. Payne re: Settlement Agreement and release.	0.3	120	\$ 36.00
1557	12/21/2021	Tonda Sutton	0.5	Confer with J. Muller re: subpoenas. Draft email to client re: address for Darin Borders.	0.5	120	\$ 60.00
1557	12/23/2021	Tonda Sutton	0.5	Confer with J. Muller, Z. Perez, and F. Payne re: CSA timeline.	0.5	120	\$ 60.00
1598	1/3/2022	Tonda Sutton	0.4	Confer with Z. Perez and F. Payne re: Rule 2004 Notice for D. Borders and Longbranch.	0.4	120	\$ 48.00
1557	12/14/2021	Tonda Sutton	0.2	Confer with Z. Perez re: dismissal. Confer with J. Muller re: dismissal.	0.2	120	\$ 24.00
1557	12/13/2021	Tonda Sutton	0.5	Confer with Z. Perez. Revise 2004 Notices. Draft email to A. Krist attaching notices.	0.5	120	\$ 60.00
1557	12/22/2021	Tonda Sutton	1.5	Continue analyzing timeline of CSAs.	1.5	120	\$ 180.00
1557	12/27/2021	Tonda Sutton	0.5	Document review with F. Payne.	0.5	120	\$ 60.00
1557	12/8/2021	Tonda Sutton	0.5	Draft 2005 Subpoena to Daniel Moore. Draft Exhibit A to Subpoena.	0.5	120	\$ 60.00

1557	12/13/2021	Tonda Sutton	0.7	Draft new Rule 2004 Notice of Examination to Darin Borders. Draft new Rule 2004 Notice of Examination to Longbranch Energy. Draft Exhibit A to Longbranch's Notice.	0.7	120	\$ 84.00
1557	12/14/2021	Tonda Sutton	0.5	Draft Rule 2004 Notice for Oral Examination to Darin Borders. Draft Rule 2004 Notice for Oral Examination to Longbranch Energy. Draft Exhibit A to Longbranch's Notice.	0.5	120	\$ 60.00
1557	12/20/2021	Tonda Sutton	1	Draft Subpoena to Appear and Testify at Hearing for Darin Borders, Longbranch Energy, Adam McLeod, John McLeod, McLeod Oil, William Kuhlmann, and Albert, Neely & Kuhlmann.	1	120	\$ 120.00
1598	2/1/2022	Tonda Sutton	0.3	Meet with J. Muller and client to perform notary services.	0.3	120	\$ 36.00
1557	12/30/2021	Tonda Sutton	.1	Client Correspondence	.1	120	\$ 12.00
	2/22/2022	Tonda Sutton	0.5	Meeting with J. Muller and client to notarize Releases of Memorandums and Mineral Deed. Scan Notices of Lien and Releases of Memorandums.	0.5	120	\$ 60.00
1557	12/8/2021	Tonda Sutton	0.5	Meeting with J. Muller and F. Payne.	0.5	120	\$ 60.00
1557	12/9/2021	Tonda Sutton	3	Meeting with J. Muller. Draft new 2004 Subpoenas for Adam McLeod, John McLeod, Laura Worsham, Christie Hebert, and William Kuhlmann, Jr. Draft Exhibits for each	3	120	\$ 360.00

				<b>Subpoena. Revise Daniel Moore's 2004 Subpoena and Exhibit.</b>			
<b>1598</b>	<b>1/3/2022</b>	<b>Tonda Sutton</b>	<b>0.1</b>	<b>Online search for status of Kuhlmann service.</b>	<b>0.1</b>	<b>120</b>	<b>\$ 12.00</b>
<b>1557</b>	<b>12/8/2021</b>	<b>Tonda Sutton</b>	<b>0.7</b>	<b>Research rules re: electronic discovery. Confer with Z. Perez re: electronic discovery. Draft new 2004 Subpoena to Darin Borders. Draft Exhibit A to Subpoena. To attorney for review.</b>	<b>0.7</b>	<b>120</b>	<b>\$ 84.00</b>
<b>1557</b>	<b>12/29/2021</b>	<b>Tonda Sutton</b>	<b>0.7</b>	<b>Review and organize emails produced by L. Worsham to potentially be used as exhibits for Response to Motion to Quash.</b>	<b>0.7</b>	<b>120</b>	<b>\$ 84.00</b>
<b>1557</b>	<b>12/9/2021</b>	<b>Tonda Sutton</b>	<b>1</b>	<b>Review and revise all Subpoenas and Exhibits.</b>	<b>1</b>	<b>120</b>	<b>\$ 120.00</b>
<b>1598</b>	<b>1/11/2022</b>	<b>Tonda Sutton</b>	<b>2</b>	<b>Review Appellees Brief. Draft Table of Authorities. Perform cite checks. Revise Table of Authorities.</b>	<b>2</b>	<b>120</b>	<b>\$ 240.00</b>
<b>1557</b>	<b>12/8/2021</b>	<b>Tonda Sutton</b>	<b>0.2</b>	<b>Review email from L. Worsham. Reply email to L. Worsham.</b>	<b>0.2</b>	<b>120</b>	<b>\$ 24.00</b>
<b>1598</b>	<b>1/24/2022</b>	<b>Tonda Sutton</b>	<b>0.3</b>	<b>Review email from RC Caviglia at ABC Legal confirming cancelled service request.</b>	<b>0.3</b>	<b>120</b>	<b>\$ 36.00</b>
<b>1598</b>	<b>1/24/2022</b>	<b>Tonda Sutton</b>	<b>0.3</b>	<b>Review emails from ABC Legal re: Kuhlmann service attempts. Cancel service request.</b>	<b>0.3</b>	<b>120</b>	<b>\$ 36.00</b>
<b>1598</b>	<b>2/8/2022</b>	<b>Tonda Sutton</b>	<b>0.3</b>	<b>Review letter and check from L. Frank and upload to Clio.</b>	<b>0.3</b>	<b>120</b>	<b>\$ 36.00</b>
<b>1557</b>	<b>12/21/2021</b>	<b>Tonda Sutton</b>	<b>0.1</b>	<b>Review reply email from client.</b>	<b>0.1</b>	<b>120</b>	<b>\$ 12.00</b>

1557	12/22/2021	Tonda Sutton	0.1	Review reply email from L. Worsham.	0.1	120	\$ 12.00
1557	12/28/2021	Tonda Sutton	0.8	Review Response to Motion to Quash, Competing Motion to Compel, and Motion to Continue. Begin drafting proposed Order.	0.8	120	\$ 96.00
1598	1/14/2022	Tonda Sutton	1	Reviewing Appellee's Brief to confirm accuracy of Table of Authorities. Collaborate with F. Payne for formatting corrections.	1	120	\$ 120.00
1557	12/8/2021	Tonda Sutton	0.3	Revise Daniel Moore's 2004 Subpoena and Exhibit A.	0.3	120	\$ 36.00
1557	12/10/2021	Tonda Sutton	0.4	Revise litigation hold letter to L. Worsham. Duplicate letter for W. Kuhlmann. Draft email to L. Worsham attaching letter. Draft email to W. Kuhlmann attaching letter.	0.4	120	\$ 48.00
1557	12/15/2021	Tonda Sutton	0.2	Revise Rule 2004 Notice and Exhibit for Longbranch.	0.2	120	\$ 24.00
1557	12/14/2021	Tonda Sutton	0.1	Revise Rule 2004 Notice to Lonbranch Energy.	0.1	120	\$ 12.00
1557	12/21/2021	Tonda Sutton	0.3	Revise Subpoenas to Appear.	0.3	120	\$ 36.00
1557	12/22/2021	Tonda Sutton	0.7	Revise Subpoenas to Appear. Draft email to L. Worsham attaching Subpoenas for Adam and John McLeod. Online request to ABC Legal for service of W. Kuhlmann.	0.7	120	\$ 84.00
1557	12/21/2021	Tonda Sutton	0.3	Search for service address for Darin Border. Confer with Z. Perez re: same.	0.3	120	\$ 36.00
1598	2/1/2022	Tonda Sutton	0.5	Meeting preparation.	0.5	120	\$ 60.00
							\$ 6216.00

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Frankie Payne	24.5	\$120/Hour	\$ 2,952.00
Tonda Sutton	22.9	\$120/Hour	\$ 2,748.00

**BILLING SUMMARY**

TOTAL CHARGES FOR THIS BILL:	\$5700.00
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EXPENSES

**FOR ADMINISTRATIVE SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
1598	02/07/2022	Expense	Court Reporter Darin Borders		\$526.75	\$526.75
1598	02/07/2022	Expense	Deposition Adam McLeod	1	\$1,322.30	\$1,322.30
1598	01/24/2022	Expense	Process Server	1	\$ 135.00	\$ 137.55
						\$1,986.60

**BILLING SUMMARY**

TOTAL CHARGES FOR THIS BILL: \$1984.05

**SUMMARY**

TOTAL FEES: \$ 46,111.60

**SERVICE LIST**

**DEBTOR**

KrisJenn Ranch, LLC  
410 Spyglass Rd  
Mc Queeney, TX 78123-  
3418

**GOVERNMENT**

**ENTITIES**

Office of the UST  
615 E Houston, Room 533  
PO Box 1539  
San Antonio, TX 78295-  
1539

U.S. Attorney  
Attn: Bkcy Division  
601 NW Loop 410, Suite  
600  
San Antonio, Texas 78216

Internal Revenue Services  
Special Procedures Branch  
300 E. 8th St. STOP 5026  
AUS Austin, TX 78701

Texas Comptroller of  
Public Account  
Attn: Bankruptcy  
P.O. Box 149359  
Austin, TX 78714-9359

Angelina County Tax  
Assessor  
606 E Lufkin Ave,  
Lufkin, Texas 75901

Nacogdoches County Tax  
Assessor-Collector  
101 West Main Street  
Nacogdoches, Texas  
75961

Rusk County  
202 N Main St,  
Henderson, Texas 75652

Shelby County, Tax  
Collector  
200 St. Augustine St.  
Center, Texas 75935

Tenaha ISD Tax Assessor-  
Collector  
138 College St  
Tenaha, TX 75974-5612

Uvalde Tax Assessor  
Courthouse Plaza, Box 8  
Uvalde, Texas 78801

**NOTICE PARTIES**

METTAUER LAW FIRM  
c/o April Prince  
403 Nacogdoches St Ste 1  
Center, TX 75935-3810

Albert, Neely & Kuhlmann  
1600 Oil & Gas Building  
309 W 7th St  
Fort Worth, TX 76102-  
6900

Laura L. Worsham  
JONES, ALLEN &  
FUQUAY, LLP  
8828 Greenville Ave.  
Dallas, Texas 75243

Craig Crockett  
CRAIG M. CROCKETT,  
PC 5201 Camp Bowie  
Blvd. #200  
Fort Worth, Texas 76107

Christopher S. Johns  
JOHNS & COUNSEL  
PLLC  
14101 Highway 290 West,  
Ste. 400A  
Austin, Texas 78737

Timothy Cleveland  
CLEVELAND|  
TERRAZAS PLLC  
4611 Bee Cave Road,  
Ste. 306B  
Austin, Texas 78746

Andrew R. Seger  
KEY TERRELL &  
SEGER  
4825 50th Street, Ste. A  
Lubbock, Texas 79414

**SECURED  
CREDITORS**

McLeod Oil, LLC  
c/o John W. McLeod, Jr.  
700 N Wildwood Dr  
Irving, TX 75061-8832

**UNSECURED  
CREDITORS**

Bigfoot Energy Services  
312 W Sabine St  
Carthage, TX 75633-2519  
C&W Fuels, Inc.  
Po Box 40  
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza  
755 E Mulberry Ave Ste.  
500  
San Antonio, TX 78212-  
3135

Granstaff Gaedke &  
Edgmon  
5535 Fredericksburg Rd  
Ste 110  
San Antonio, TX 78229-  
3553

Hopper's Soft Water  
Service  
120 W Frio St  
Uvalde, TX 78801-3602

Larry Wright  
410 Spyglass Rd  
Mc Queeney, TX 78123-  
3418  
Medina Electric  
2308 18th St. Po Box 370  
Hondo, TX 78861-0370

Medina's Pest Control  
1490 S Homestead Rd  
Uvalde, TX 78801-7625

Texas Farm Store  
236 E Nopal St  
Uvalde, TX 78801-5317

Uvalco Supply  
2521 E Main St  
Uvalde, TX 78801-4940

Longbranch Energy  
c/o DUKE BANISTER  
RICHMOND  
Po Box 175  
Fulshear, TX 77441-0175

DMA Properties, Inc.  
896 Walnut Street at US  
123 BYP  
Seneca, SC 29678